

Karen Ashikeh LaMantia
 341 Bonito
 Long Beach, CA 90802
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Ms. Angela Reynolds , Environment Officer
 Department of Planning and Building: Sports Park DEIR
 City Of Long Beach
 333 West Ocean Blvd.
 Long Beach, CA 90802

Concern - DANGER of FIRE and EXPLOSION

The danger of fire and explosions from ground gasses, oil pipelines and wellheads is documented throughout this section of the EIR. This danger is so significant, the plan identifies the necessity of having minimum exterior windows and no windows on exterior well-facing walls for the buildings proposed in this plan. This does not consider that this project is a proposed sports part, where the majority of those visiting the site will be outside playing sports or watching sports, unprotected by any walls.

The danger is identified to be compounded by the increased numbers of people at the site. No mention is made of increased power lines and high voltage power equipment or the increase of chance of fire from vehicle accidents. The large amount of natural gas use proposed for this project also indicates there will be cooking on site and other uses of open flames for water heating, etc. leading to potentials for fire on the site from volatile gas emissions associated with past and present oil drilling.

DANGER OF OIL FIRES AT OIL WELLS and OIL PIPELINES

Section 4:13.9 deals specifically with oil well safety and admits that this project cannot require existing pipelines to upgrade to either accommodate the large numbers of people on the site or potential disturbance to existing and previously used pipelines. Though KNOWN pipelines carrying hazardous materials will not be disturbed by the proposed project, the potential for harm for the human population in the area will increase from the unknown buried toxic materials and pipelines. The transport of hazardous materials from existing facilities in proximity to the large crowds of people on site will compound the risk to human populations.

It is proposed that all new or relocated pipeline on or adjacent to this project be equipped with check valves to reduce risk of pipeline leaks on site. This does not mitigate the problem of the existing, older pipelines in use at their current locations, or of unknown pipes, lines or buried toxic waste that may be disturbed by grading at this site.

Questions: Does this project expose large numbers of people to unnecessary risk, because of the location of this project near potentially explosive substances, some of which are not known at this time?

Does the proximity of large numbers of people at this site pose a safety risk to oil production facilities and therefore the surrounding community?

Thank you for your consideration of my concerns.

Karen Ashikeh LaMantia
 2/7/05

KAREN ASHIKEH LAMANTIA/SECOND LETTER

P-5-1

Explosive gases, such as methane, typically require a confined or semi-confined environment in which to accumulate to the extent that explosivity is a possibility. The proposed Sports Park will allow for the dissipation of on site gases that are a by-product of the operating oil wells.

Section 4.13 of the Draft EIR states that a methane assessment will be conducted after 30 days have elapsed since rough grading has been completed. The intent of the methane assessment is to adequately identify gas conditions across the site at proposed hardscape and building footprint areas in order to determine whether there is a risk of methane accumulation. Based on the results of the methane assessment, methane mitigation may be necessary as documented in the Draft EIR.

P-5-2

Mitigation Measure 4.13.11 within Section 4.13 of the Draft EIR states that prior to the issuance of grading permits, the City or its contractor will prepare a fire safety study of all the operating oil wells, proposed building setbacks, and site design to the satisfaction of the Fire Chief and Building Official. The purpose of the study is to determine the base level of protection that the California Fire Code provides and recommend alternative safety measures. The alternative safety measures will provide nonconforming distance requirements with an equal or greater level of safety as prescribed by the Code. The safety measures are listed within Mitigation Measure 4.13.11 in Section 4.13 of the Draft EIR, pages 4.13-39 and 4.13-40.

P-5-3

There is no Section 4.13.9 within Section 4.13 of the Draft EIR. There is, however, a Mitigation Measure 4.13.9 specific to safety shutdown devices for active oil wells.

Section 4.13 of the Draft EIR states that a Soil Management Plan will be prepared and approved by the LARWQCB prior to the commencement of demolition and grading activities on site. The purpose of the Soil Management Plan is to provide direction in the event that discolored or odiferous soil is discovered.

The term “unknown toxic materials and pipelines” as used in this comment is a misapplication of the term “toxic.” A material is identified as toxic after sampling and analysis. It is possible that discolored or odiferous soils may be uncovered or discovered during the demolition and grading activities to be conducted on site. The LARWQCB-approved Soil Management Plan will address the specific steps to follow in the event that such soils are discovered.

Additionally, Section 4.13 of the Draft EIR addresses a similar misuse of the term at the public scoping meeting on page 4.13-32. Moreover, the historic use of the project site was as an oilfield. The numerous investigations that have been conducted on site resulted in the collection and analysis of over 867 soil samples and over 112 soil vapor samples. The chemicals detected in site soils and soil vapor are indicative of oil field uses. Total petroleum hydrocarbon constituents associated with

oilfield activities are typically heavy-end hydrocarbons or crude oil. The health risk associated with crude oil is much smaller than the risk at sites impacted by refined oil products.

Furthermore, crude oil is considered a designated waste, not a hazardous waste, under current California regulations. Therefore, the Draft EIR appropriately characterizes the existing site conditions and potential risks, and no change to the Draft EIR is warranted.

P-5-4

Section 4.13 of the Draft EIR states that a Soil Management Plan will be prepared and approved by the LARWQCB prior to the commencement of demolition and grading activities on site. The purpose of the Soil Management Plan is to provide direction in the event that discolored or odiferous soil is discovered. Pipes and pipelines discovered during site grading activities in addition to unused pipes and pipelines uncovered during grading activities will be handled in accordance with the applicable federal, State, and local regulations and will be removed from the site.

P-5-5

Please see Responses to Comments P-5-1 and P-5-4.

P-5-6

Section 4.13 of the Draft EIR states that the project plans and documentation will be submitted to the City Building Official and the City of Long Beach Fire Department for review and approval. See Mitigation Measures 4.13.9 through 4.13.11.